

# GCD

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264487

March 7, 2005

**VIA FACSIMILE and REGULAR MAIL**

Mr. Thomas J. Krueger  
Associate Regional Counsel  
U.S. EPA Region 5  
77 West Jackson Blvd.  
Chicago, IL 60604-3590

**RE: Downers Grove Sanitary District/Ellsworth Industrial Park**

Dear Tom:

Thank you for forwarding to us the comments of Bob Kay regarding the Supplemental Sludge Lagoon and Groundwater Sampling Report. I sent Bob's comments to Jim Huff and Larry Cox to review and enclosed is the response from our environmental consultant Huff & Huff to the questions that Bob Kay raised in his February 23, 2005 memorandum. Needless to say, we are very pleased to learn that U.S. EPA no longer considers the sludge lagoons as a source of the groundwater contamination at the Ellsworth Industrial Park area, and we are very anxious to discuss with you as soon as possible how we can resolve Downers Grove Sanitary District's status as a PRP at this site.

With respect to your offer of assistance through EPA's Central Regional Lab concerning the 1994 sludge data, we certainly agree that it is worth the effort to pursue this. You should be aware, however, that the District contacted its lab on multiple occasions to no avail in an attempt to learn whether there was additional documentation concerning the 1994 sample results. We will certainly call Sylvia Griffin and seek out her assistance with locating documentation there may be from the 1994 sampling data.

Mr. Thomas J. Krueger  
March 7, 2005  
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I will call you shortly to discuss with you how we should proceed in formerly resolving the District's alleged liability at the Ellsworth Industrial site. If you have any questions before then, please do not hesitate to call me at 312-569-1443.

Very truly yours,

A handwritten signature in black ink, appearing to read "Mark A. Latham", with a stylized flourish at the end.

Mark A. Latham

Enclosures

cc: Larry Cox (w/enclosures)  
Jim Huff (w/enclosures)

CH01/12413068.1



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and consultants

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To: Mark Latham

From: James E. Huff, P.E.

Date: February 24, 2005

**RECEIVED**

**MAR 3 - 2005**

**MARK LATHAM**

Subject: Downers Grove Sanitary District

Response to Bob Kay's Comments in his February 23, 2005 Letter regarding  
Supplemental Sludge Lagoon and Groundwater Sampling

I have reviewed Bob Kay's memo dated February 23, 2005, and can provide additional insight into his questions.

*Comment 2-Were D.O. and oxidation-reduction potential measured during the well purging?*

Appendix D contains the purge data. Dissolved oxygen, conductivity, pH, and temperature were all measured each well volume. Oxidation-reduction potential (ORP) was not measured due to our oversight. Our field staff was using the Work Plan, and missed the subsequent ORP request.

*Comment 3-Many of the groundwater measurements indicate more variation in water levels than would be expected due to natural causes. It may be prudent to explicitly note some of these data are suspect.*

I don't believe any of the data are suspect. If I were to mark such an indication, it would be arbitrary. The 4<sup>th</sup> quarter 2004 water elevations were taken after the wells were opened and allowed to equilibrate for two hours, with readings indicating the wells stabilized after the first hour. The 4<sup>th</sup> quarter 2004 elevation data look similar to the earlier results, with large variation from well-to-well, similar to previous sampling events.

*Comment 4 - Groundwater Flow Direction and the ignoring of some data.*

As noted by Mr. Kay, the regional flow is more complicated than depicted on our Figure 3-4, which was intended to represent the localized flow over a small area. The text of the report discusses our concerns and highlights specific issues pertaining to calculation and presentation of flow.

The reason for not utilizing DG-5(I) was stated in Section 3.5 *Hydrogeology*, that is the potential that this well is screened into a discrete aquifer.

The reason elevation data from BD-4(I) was omitted was due to this measurement being collected on November 30, whereas all other wells were measured on November 29<sup>th</sup>. Access to this well could not be gained until we were provided with a set of keys on the 30<sup>th</sup> from Weston.

Preference was given to data from DG-1(I) over DG-1(D) due to historic issues of inconsistent elevation data and it appears to be screened within different strata.

The reason for ignoring elevation data from DG-15(I) was stated in the document since it also appears to be screened into different strata and is on the other side of St. Joseph Creek.

Monitoring well LD-1(I) was not slated as part of this sampling project and we did not sample any of the EPA wells, only gaining access to BD-4(I) for water table elevation data on the second day of the project.

I believe the reasons for presenting the calculated local flow are consistent with previous calculations and representation, and the presented local flow makes the most sense based on available data from this localized area.